
Toxics Reduction Plan - Summary

Chromium (and its compounds)
CAS # - NA-04

Prepared for:
Gray Tools Canada Inc.
299 Orenda Road
Brampton, Ontario
L6T 1E8

Prepared by:
Airzone One Ltd.
222 Matheson Blvd E
Mississauga, ON
L4Z 1X1

1.0 Introduction

1.1. *General Information*

The facility is located at 299 Orenda Road, Brampton, Ontario. The facility was required to report three TRA substances: Chromium (and its compounds) (CAS# - NA-04), Cobalt (and its compounds) (CAS#: NA-05), and Lead (and its compounds) except tetraethyl lead (CAS# - NA-08). Chromium, cobalt and lead are constituents of the primary products purchased (steel) at the Facility.

This plan summary is for Chromium (and its compounds) (CAS# - NA-04). Chromium is one of the constituents of the primary products purchased (steel) at the Facility. The Facility manufactures steel hand tools, where chromium is a component of steel alloys.

Table 1 - General Facility Information

NPRI Number	27053
O Reg 127/01 Number	N/A
Number of full time employee equivalents	50
NAICS Code (2 digit)	31-33 - Manufacturing
NAICS Code (4 digit)	3322 - Cutlery and hand tool manufacturing
NAICS Code (6 digit)	332210 - Cutlery and hand tool manufacturing
UTM Coordinates	17 T 603509 m E 4839330 m N
Company Legal Name	Gray Tools Canada Inc.
Company Trade Name	Gray Tools Canada Inc.

1.2. Plan Contacts

A list of the individuals involved in the planning process is provided below:

Table 2 – Plan Contacts

<p>Public Contact</p> <p>Paul Dean V.P. Operations Tel: (905) 457-3014 ext. 233 Fax: (905) 457-1050 Email: PaulD@GRAYTOOLS.com</p>
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2.0 Facility's Intent, Objectives and Targets

2.1. Use

The act requires that a facility include a statement of intent to reduce the use of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the use of the toxic substance. In addition to this, the facility is required to provide a list of objectives.

Statement of intent:

The facility does not have a statement of intent. However, Gray Tools Canada Inc. does intend to continue to monitor current research on reducing chromium in the steel it uses.

Reason why the facility does not have a statement of intent: (if applicable)

Gray Tools Canada Inc. does not intend to reduce the use of chromium because (i) there are no further reduction options possible, and, (ii) they are in the business of producing steel tools and there is not a suitable substitute that could provide a product that is within the customers' demands.

Objectives: (a list of objectives to reduce if any)

Although Gray Tools Canada Inc. does not intend to reduce the use of chromium, they will continue to conduct further research to identify new reduction options and to keep up with industry standards with regards to chromium.

Quantity Target: (if any)

No target

Target Timeline: (if any can be expressed in years or described in text box, or no timeline can be selected)

No timeline

Reason why toxic substance is used at the facility: (from drop down menu options)

As a formulation component.

2.2. *Creation*

The act requires that a facility include a statement of intent to reduce the creation of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the creation of the toxic substance.

Statement of intent:

The facility does not have a statement of intent.

Reason why the facility does not have a statement of intent:

The facility does not create the subject substance at the facility; therefore it is not required to provide a statement of intent on the creation of this substance.

Objectives: N/A.

Quantity Target: N/A.

Target Timeline: N/A.

Reason why toxic substance is used at the facility: N/A.

3.0 Facility's Goals

There are no reasonable substitutions for this substance and many of the reduction options possible have already been implemented in the past.

4.0 Facility TRA Plan (info)

This plan summary is accurate, up to date and reflects the current facility version of the Toxic Reduction Plan.

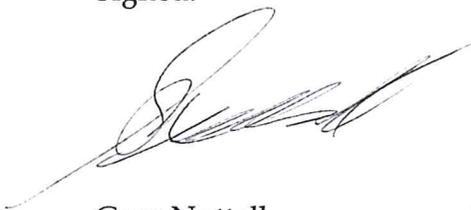
5.0 Signed Certification Statements

Certification by highest ranking employee

As of September 18th, 2018 [date], I, Gary Nuttall, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and the plan complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Chromium (and its compounds)

Signed:

A handwritten signature in black ink, appearing to read 'Gary Nuttall', written over a horizontal line.

Gary Nuttall
President
Gray Tools Canada Inc.

Certification by toxic substance reduction planner

As of September 18th, 2018 [date], I, Franco DiGiovanni, certify that I am familiar with the processes at Gray Tools Canada Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated September 18th, 2018 [version date] and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Chromium (and its compounds)

Signed:

A handwritten signature in black ink, appearing to read 'DiGiovanni', written in a cursive style.

Franco DiGiovanni
Airzone One Ltd.